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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVEN DOUGLAS ROCKETT,

Defendant.

Case No.: 3:13-CR-00557-SI

DEFENDANT'S NOTICE OF
EXPERT WITNESSES

Defendant, Steven Douglas Rockett, through his attorneys, Andrew D. Coit and Chelsea B. Payment, hereby provides notice that defendant intends to call the following expert witnesses at trial:

1. Joel D. Brillhart, C.F.C.E., 8921 NW Benson, Portland, Oregon 97229, Phone: (503) 348-6407. Mr. Brillhart's qualifications are provided in his C.V., which has been submitted as Defendant's Exhibit 115. Mr. Brillhart conducted the forensic examination of all digital devices in this case on behalf of defendant. Mr. Brillhart will testify as to what digital evidence was found on defendant's devices. Defendant's purpose in calling Mr. Brillhart is to provide testimony about the difference between RAR files, files located in unallocated space or "cache," and deleted files, and which specific images the government intends to offer as evidence against

defendant fit which file format. Mr. Brillhart is also expected to rebut the government's computer forensic expert's testimony as necessary. Rather than summarizing Mr. Brillhart's reports of his evaluation of defendant's digital devices, defense counsel provided these reports as part of discovery and is offering them as Defendant's Exhibits 113 and 114, to be referenced during Mr. Brillhart's testimony, which is intended to provide the government full notice as to what the scope of Mr. Brillhart's testimony will be at trial. Mr. Brillhart is not available to testify as a witness on May 23, 2016.

2. Wendy Bourg, Ph.D., 3906 SW Kelly Ave., Portland, Oregon 97239, Phone: (503) 320-6996. Dr. Bourg's qualifications are provided in her C.V., which has been submitted as Defendant's Exhibit 117. Dr. Bourg conducted the forensic screening of the FBI agents' reports regarding interviews of minor witnesses located in the Philippines, and inducements offered to these witnesses by the government for testifying against defendant. Defendant's purpose in calling Dr. Bourg is to establish to what extent witness' statements and actions may be impacted by direct or indirect inducements offered by the government. Further, defendant seeks to have Dr. Bourg opine as to whether the FBI agents' interviews of children were conducted pursuant to forensically sound methodologies. Dr. Bourg is also expected to testify about the potentially intimidating nature of the interviews that took place in the Philippines. Dr. Bourg is expected to further testify about the investigation pertaining to the alleged victims in Oregon. Dr. Bourg testified at length in State of Oregon vs. Steven Rockett, Washington County Case Numbers: C140306CR, C131929CR, and C132673CR. Dr. Bourg will testify in a substantially similar

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fashion as she did in State vs. Rockett. Rather than summarizing that extensive testimony, defense counsel will provide a copy of the transcript of Dr. Bourg's testimony as discovery to the government. Paul Maloney was one of the assistant district attorneys prosecuting defendant in State v. Rockett.

RESPECTFULLY SUBMITTED this 2nd day of May, 2016.

/s/ CHELSEA B. PAYMENT
Chelsea B. Payment, OSB #141125
Of Attorneys for Defendant

Certificate of Service

I hereby certify that on the above-mentioned date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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